

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 25-mj- 1253

MANUEL JUAN MATEO

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of February 24, 2025, in the County of Chautauqua, in the Western District of New York, the defendant did knowingly commit the offense of possession of a forged, counterfeit, altered and falsely made alien resident card, in violation of **Title 18, United States Code, Section 1546(a)**.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.




*Complainant's signature*

JANESSA MYLES  
DEPORTATION OFFICER  
IMMIGRATION AND CUSTOMS ENFORCEMENT

*Printed name and title*

Sworn to before me and signed telephonically.

Date: March 13, 2025



*Judge's signature*

City and State: Buffalo, New York

HONORABLE JEREMIAH J. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK    )  
COUNTY OF ERIE        )    SS:  
CITY OF BUFFALO        )

I, JaNessa Myles, having been first duly sworn, do hereby depose and state as follows:

1. I am a Deportation Officer with the United States Department of Homeland Security ("DHS"), Immigration and Customs Enforcement, (ICE.) I have been so employed since the creation of DHS in March 2003. Prior to the creation of DHS, I was employed by the former Immigration and Naturalization Service under the United States Department of Justice since April of 1995.

2. As a part of my duties during my employment with ICE, I investigate violations of the Immigration and Nationality Act and violations of the United States Code, including violations of Title 18, United States Code, Section 1546(a), possession of a forged alien registration card.

3. This affidavit is being submitted for a limited purpose, that is, a probable cause determination. Therefore, I have not presented all of the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from law enforcement officers and witnesses. This affidavit is intended

to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my knowledge about this matter.

4. I make this affidavit in support of a criminal complaint charging Manuel JUAN MATEO, (JUAN MATEO), with a violation of Title 18, United States Code, Section 1546(a) (possession of a forged alien registration card). Since this affidavit is offered for the limited purpose of securing a criminal complaint, it does not contain all the information obtained during the course of the investigation.

5. On February 24, 2025, Immigration and Customs Enforcement (ICE) Office of Enforcement and Removal Operations (ERO) Buffalo Field Office conducted a targeted enforcement action in Dunkirk, New York to locate and arrest a final order alien. ICE ERO observed a male subject matching the description of the target, approximately 5'7" tall, weighs around 200 pounds, with black hair, exit the address and get into the back of a Black Chevy Suburban parked in front of the residence. Then, ICE ERO activated their emergency light, and conducted a vehicle stop on that Suburban. ICE ERO with Police/ICE identifiers on their outer clothing and wearing a body camera approached the driver side of the vehicle. ICE ERO identified themselves as Law Enforcement Officers to the driver and passengers of the vehicle. During questioning, a passenger seated in the back of the vehicle presented a United States of America Permanent Resident Card with the following identifier: Manuel JUAN MATEO, A-number XXX XXX 462, COB: Mexico, DOB: 02/24/19XX. The passenger, later identified as JUAN MATEO, was asked by ICE ERO (via translator app) if the card was "real", to which he responded "yes". Immigration record checks were conducted on the scene



by ICE ERO, and it was determined that the Permanent Resident Card was fraudulent. The information on the card did not match the information in the Immigration Database. JUAN MATEO was taken into custody without incident by ICE ERO and transported to the Buffalo Federal Detention Facility in Batavia, New York for further processing.

6. Every alien who lawfully immigrates to the United States has a unique “A-number” assigned to them by the United States Department of Homeland Security. The Department of Homeland Security maintains an “A-file” for each alien. Any document issued for the alien, including a Permanent Resident Alien Card, lists the unique “A-number” for that alien.

7. A Permanent Resident Alien Card serves as proof of the cardholder’s lawful resident status within the United States, as well as his or her ability to seek and obtain employment in the United States.

8. According to the official records of the United States Department of Homeland Security, United States Citizenship and Immigration Services (“USCIS”), Alien Registration Number XXX XXX 462 is a valid alien registration number and has been assigned to an individual other than JUAN MATEO by the United States Department of Homeland Security. Therefore, the alien registration card bearing the A-number XXX XXX 462, presented by JUAN MATEO, is a counterfeit and fraudulent document, which was not issued by the United States. Immigration Database inquiries show that JUAN MATEO has no legal right to be in the United States.

9. WHEREFORE, it is respectfully submitted that probable cause exists to believe that JUAN MATEO did commit the offense of possession of a forged, counterfeit, altered or falsely made alien registration card, in violation of Title 18, United States Code, Section 1546(a), in that he, a citizen and native of Guatemala, was illegally present in the United States, did knowingly possess an alien registration card bearing his name, which he knew to be forged, counterfeited, altered, or falsely made.



JaNessa Myles  
Deportation Officer  
Immigration and Customs Enforcement

Sworn and subscribed to before me telephonically  
on this 13<sup>th</sup> day of March 2025.



HONORABLE JEREMIAH J. MCCARTHY  
United States Magistrate Judge